99554/ No 0000023

WESTON
100 CORPORATE NORTH, SUITE 101
ROUTE 22 AND LAKESIDE DRIVE
BANNOCKBURN, ILLINOIS 60015
(312) 295-6020

TRANSMITTAL

TO: Gene Wong, RSPO, U.S. EPA

FROM: Robert J. Karnauskas, Site Manager, WESTON RJK

DATE: December 7, 1984

PROJECT: Skinner Landfill, REM II Site No. 130

DOCUMENT NO: 130-WP1-EP-ANMF-1

SUBJECT: Interim Report

ACTION: Information Only

Enclosed is s copy of the Interim Report for the Skinner Landfill site in West Chester, Ohio. As we discussed on November 30, 1984, review of aerial photographs from early 1976 has substantially altered our understanding of the possible extent of chemical waste activities at the site. See Document No. 130-WP-1-MT-ANBU-1, Meeting Report; attached.

RJK:ens

cc: Fred Larson
John W. Hawthorne
Glen Johnson
Richard Metnick, w/enclosures
Tom Ontko, w/ enclosures

FRED LARSON (PSS copy)

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MEETING REPORT

TO: Distribution

FROM: Robert J. Karnauskas RJK

DATE: December 7, 1984

PROJECT: Skinner Landfill -- Site No. 130

DOCUMENT NO.: 130-WP1-MT-ANBU-1

SUBJECT: Summary of Meeting Held on November 30, 1984 at offices of Roy F. Weston, Inc., in Bannockburn, Illinois

ACTION: Information Only

On Friday, November 30, 1984, a meeting was held to discuss the Sampling and Analysis Plan (S&AP) for the Skinner Landfill site. Present at the meeting were:

- Robert Karnauskas, Site Manager
- Gene Wong, U.S. EPA, RSPO
- Edward Need, Project Hydrogeologist
- James Burton, Project Engineer

Background

The meeting was requested because aerial photographs dating from early 1976 (two months before the fire and subsequent Ohio EPA activity at the site) had arrived on Tuesday, November 27, 1984 from Ryan Engineering. The existence of these photographs had been general knowledge since the beginning of the current RI/FS activities. Efforts had been made to obtain them though the Ohio EPA without success, predominantly because the photographs were being held as evidence from the State's lawsuit in Butler County Court of Common Pleas. Thus the photographs were not available during preparation of the Interim Report, which was submitted for REM II review on Monday, November 26, 1984.

Discussion of the Ryan Engineering photographs in the Remedial Action Master Plan (RAMP) and other primary documents relating to the site situation in 1976 had concentrated on the existence and location of a waste lagoon and on evidence of active waste disposal in that lagoon. This and other references to "hundreds of drums" in the vicinity of the lagoon, and possibly the landfill, had created the impression that chemical waste activities at the site were probably short-lived and of limited areal extent. However, inspection of the Ryan Engineering photographs indicates that the potential scope of chemical waste handling, as inferred from the location of drums on-site, is quite extensive and may include as much as 75 percent of the Skinner property. Thus, it became clear that a detailed inspection of the entire site would be needed to scope the S&AP in detail.

Meeting Discussions

There were four main topics of discussion:

- The appropriateness and/or practicality of certain tasks as presented in the Work Assignment's scope of work.
- The need for a detailed site inspection and its impact on and relationship to the Sampling and Analysis Plan.
- The investigative approach of the Sampling and Anlysis Plan.
- The issue of site access for aerial survey ground control, detailed site inspection, and the main RI field work.

Work Assignment Tasks

The purpose of this discussion was to call to the attention of the RSPO tasks in the scope of work accompanying the Work Assignment that appeared to be inappropriately scoped or impratical given current knowledge of site activities. Specific tasks discussed were as follows:

- Drum and Storage Tank Sampling and Analysis -- the task description indicates sampling of up to 50 drums; however, based on the initial site visit, they do not appear to be any (unburied) drummed wastes on-site.

- Geophysical Surveys -- the task description indicates a magnetometer survey of the entire (78 acre) site at a 25-foot grid with correction for diurnal variation and computer modeling for analysis; however, the site has local relief of about 50 to 70 feet, many steep and/or wooded slopes, and numerous piles of metallic debris.

- Detailed Site Characterization Studies -- due to apparently large extent of chemical waste activities, tasks for installation and sampling of monitoring wells, surface water and sediment sampling, and soil sampling will probably have to be expanded in scope. (See below).

- Assess Site Hazards -- The scope of this task was clarified as including an "endangerment assessment" (quantification of impacts resulting from a no-action alternative) to be performed by Clement Associates.

The RSPO acknowledged that adjustments might be needed for these tasks, and that he understood the reasons for such adjustments.

Detailed Site Inspection

The aerial photographs taken in early 1976 by Ryan Engineering were introduced, and the apparent extent of chemical waste activities was discussed. Drums were identified in many areas of the site including:

- Landfill and adjacent areas - about 200.
- Lagoon and adjacent areas - about 500.
- Top of the western hill - about 40.
- Valley of East Fork - about 30.
- Valley of "Skinner Creek" - about 30.
- Northeast corner of the site - about 20.

Between the date of these photographs and inspection of the site by Ohio EPA, substantial earth moving activity reportedly occurred at the site. The potential extent of burial of this number of drums on-site can only be speculation. However, the Ryan Engineering photographs suggest burial of drums occurred in other areas of the site besides the lagoon.

It was agreed that the initial site visit of October 9, 1984 did not provide enough detailed information about existing site conditions to prepare a Sampling and Analysis Plan unless substantial contingencies were included. It was also agreed that the RAMP did not accurately reflect the site conditions evident in the Ryan Engineering photographs. Thus, two directions for continued execution of the project were considered:

- Place further project plan(s) preparation on temporary hold, perform a detailed site inspection as soon as possible given access and snow cover restraints, and then resume preparation of a detailed S&AP.
- Continue preparation of S&AP using best available data, perform a detailed site inspection as part of the RI field work, and adjust scope accordingly in the field.

The first course of action would delay the project, but it would result in a S&AP that had a higher degree of certainty relative to the scope of field work. The second course of

action would not delay the project, but it would result in an "overscoped" S&AP (to allow for contingencies) and require a substantial number of field decisions.

The RSPO indicated that the first course of action was likely to be more favorably received by the agency, even though an amendment to the interim anthorization might be needed. This course of action was selected.

Investigative Approach

Due to the apparent extent of chemical waste activities, the entire 78 acre site needs to be investigated. The approach developed for this RI field investigation was presented. It has three basic objectives:

- o characterization of the physical setting of the site and the processes acting on it,
- o characterization of waste materials and contaminant sources on the site,
- o and characterization of contaminant migration both on and off the site.

The scope of activities needed to address the first objective is primarily a function of the size of the site and essentially independent of existing conditions. Thus, this scope could be presented in some detail and included:

- o Thirty (30) soil and rock borings (one boring per 2.5 acres) to define soil lithologies, soil stratigraphy, bedrock topography, bedrock lithology and hydrostra- tigraphy.
- o Forty-five (45) monitoring wells (thirty water table wells and fifteen nested peizometers) to define perched water, water table configuration, groundwater flow patterns, vertical flow conditions, recharge/discharge areas and groundwater flow rates.

- Eleven staff gages, three streamflow measurement stations, and one rain gage to define groundwater-surface-water interactions, streamflow characteristics, and rainfall-runoff relationships.

- Ecological surveys of aquatic and terrestrial flora and fauna to characterize local biotic systems, identify sensitive communities or species, and locate areas of environmental stress.

The scope of activities needed to address the second objective is partly of function of the extent and location of former chemical-waste handling activities, but is also dependent on existing site conditions. In the past, the owners have significantly altered site conditions to make investigation of their chemical waste activities difficult; and they are still at liberty to alter the site conditions at will. Thus, it is important that RI/FS planning be based on detailed, up-to-date knowledge of site conditions.

Although this knowledge will not be available until the detailed site inspection is made, examination of the Ryan Engineering photographs indicates that the site can be subdivided into twenty-two (22) areas on the basis of topography and land use (waste activity). These areas will be used as the basis of investigations for characterization of waste materials and contaminant sources. The investigations will feature selective use of geophysical surveys, surficial soil sampling, soil borings, test excavations, monitoring wells, and waste sampling.

The scope of activities needed to characterize contaminant migration can be conceptually defined, but the level of effort and number of samples taken will depend on the number and distribution of prossible contaminant sources based on the site inspection identifying suspected "disturbed" areas. These activities will include sampling and standard CLP organic and inorganic analysis of the following:

- Groundwater - from at least 45 general-purpose monitoring wells and any additional wells installed for source characterization.

- Water supplies - from about 15 to 20 domestic or municipal water supply wells, particularly those on-site and downgradient (inferred).
- Surface water - from the two streams -- upstream, within and downstream of the Skinner property, and from any surface impoundments (ponds) found on-site.
- Sediment of surface water bodies - at the same locations as surface water sampling.
- Aquatic organisms - in the two streams - upstream, within and downstream of the Skinner property, and in any surface impoundments (ponds) found on-site.

Site Access

Discussions concerning site access focussed on the nature and content of legal documents providing long-term access for performance of the RI field investigations, and on the possible need for short-term access agreements for aerial survey ground control and the detailed site inspection.

Long-term site access could be obtained through a written agreement with the owners or a Section 106 Administrative Order. If the 106 Order was resorted to, a preliminary endangerment assessment would be needed to justify the order. The RSPO and the U.S. EPA attorney assigned to the case had not been able to meet, so the status of the written agreement approach (currently underway) is uncertain. A meeting of the REM II team, the RSPO and the attorney was planned for the afternoon of December 5, 1984.

Upon learning that "standard" written access agreements were only two pages long, the REM II team expressed concerns relative to two potentially sensitive issues -- the ability of the agency and the REM II team to control what occurs on the site, and the possible destruction of monitoring installations due to unrestricted activity by the owners. It was agreed that the owners have altered site conditions in the past, that they are still able to do so, and that it

should be anticipated that they might continue to alter site conditions during the RI field work. It was also agreed that the agency and the REM II team would need to be able to control Skinner activities on-site so that the integrity of the RI could be assured. The issue of property destruction was raised so that it could be specifically addressed in the access documents.

Given the current status of efforts to obtain long-term access, it became clear that some type of short-term access would probably be needed so that the aerial photography subcontractor could perform ground-control surveying for the topographic map of the site. This activity was estimated to require as much as 3 days of field work, and some brush clearing. Short-term access would also be needed for the detailed site inspection, which involves unrestricted site access for a field team of six to seven individuals for 2 to 3 days. These issues were places on the agenda of the December 5th meeting.

Key Points

The key decisions and agreements of this meeting were as follows:

- It was agreed that certain tasks of the scope of work contained in the Work Assignment might need to be changed.
- It was agreed that examination of the Ryan Engineering photographs of early 1976 indicated potentially widespread chemical-waste activities, and that this situation was not indicated by the RAMP or the primary documents reviewed for the Interim Report.
- It was agreed that a detailed site inspection would be needed before a Sampling and Analysis Plan, having a high degree of certainty relative to scope, could be prepared.
- The RSPO decided to place further project plan preparation on hold, pending execution of a detailed site inspection.

- It was argreed that the approach to the RI field work was acceptable and that the scope, where defineable, was appropriate.

- It was agreed that the agency and the REM II team would need to be able to control what occurred on the site so that the integrity of the RI would be assured.

Actions

As a result of the decisions and understandings reached at this meeting, the following actions were to be initiated:

- The REM II team would:

  - update the Site Evaluation Forms (SEF) to address the activities planned for the detailed site inspection.

  - provide level-of-effort (LOE) and cost estimates for the detailed site inspection and post-visit documentation.

  - continue with preliminary characterization of chemical waste activities on-site using the 1976 aerial photographs and any other aerial photographs obtainable prior to the detailed site inspection.

  - attempt to obtain negatives of the Ryan Engineering 1976 photographs and any other aerial photographs of the site taken by that firm.

  - coordinate with the U.S. EPA and the newly selected aerial photography subcontractor regarding site access issues.

- The RSPO would:

  - determine and execute measures needed to add the detailed site inspection to the interim authorization.

- pursue site access issues with the U.S. EPA attorney assigned to the case and schedule a meeting with him and the REM II team on the afternoon of December 5, 1984.

Distribution: Meeting participants
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Glen Johnson